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 Futures Trading Commission

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION**

U.S. COMMODITY FUTURES TRADING	)	
COMMISSION et al.,	)	
	)	Case No.: 05-cv-02641-JSW
Plaintiffs,	)	
	)	Judge: The Hon. Jeffrey S. White
vs.	)	
	)	Next Hearing: September 15, 2006, 9:00 a.m.
NATIONAL INVESTMENT	)	
CONSULTANTS, INC., et al.,	)	STIPULATED MOTION FOR ENTRY OF
Defendants,	)	CONSENT ORDER OF PERMANENT
	)	INJUNCTION AND OTHER EQUITABLE
and	)	RELIEF
	)	
THERESA C. WONG, an individual,	)	
Relief Defendant.	)	
	)	

COMES NOW Plaintiffs, U.S. Commodity Futures Trading Commission  
 (“Commission”) and the Commissioner of Corporations for the State of California (“State of  
 California”) and Defendants, National Investment Consultants, Inc. (“NICI”), Wei Man Tse  
 a.k.a. Raymond Tse, Run Ping Zhou a.k.a. Flora Zhou a.k.a. Flora Giorgi, and Yi “Kerry” Xu and

1 Relief Defendant Theresa Wong (collectively, "Defendants") and hereby move this Court for  
2 entry of the [Proposed] Consent Order of Permanent Injunction and Other Equitable Relief  
3 ("Proposed Consent Order") filed concurrently herewith.  
4

5 The Plaintiffs and Defendants reached a mutually-agreed settlement of the litigation.  
6 This settlement is memorialized in the Proposed Consent Order and entry of the Proposed  
7 Consent Order will resolve this litigation and will settle all matters alleged in the Complaint  
8 against Defendants. The parties, as stipulated in the Proposed Consent Order, respectfully  
9 request that this Court execute and enter the Order as submitted.

10 The parties also request that the Court execute and enter an attached Stipulation which  
11 modifies the originally executed Proposed Consent Order so that typographical errors noted by  
12 counsel after execution of the order by Defendants be corrected pursuant to the attached  
13 Stipulation. The Proposed Consent Order, attached hereto, incorporates the agreed to corrections  
14 noted in the Stipulation.  
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21 Respectfully submitted,

Dated: August 31, 2006

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24 Kevin K. Batteh  
25 James H. Holl, III  
26 Attorneys for Plaintiff U.S. Commodity  
27 Futures Trading Commission  
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Dated: August 31, 2006

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Wayne Strumpfer  
Alan S. Weinger  
Edward Kelly Shinnick  
Corporations Counsel

Attorneys for Plaintiff Commissioner of  
Corporations of the State of California

Dated: August 31, 2006

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Edward Gartenberg  
Alexandra Epand  
Robert A. Weikert  
Attorneys for Defendants  
National Investment Consultants, Inc.;  
Wei M. Tse aka Raymond Tse and for  
Relief Defendant Theresa Wong

Dated: August 31, 2006

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John W. Cotton, Esq.  
Cotton & Gundzik, LLP  
Counsel for Defendant Yi Kerry Xu

Dated: August 31, 2006

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Fred Koningsberg, Esq.  
Counsel for Defendant Run Ping Zhou  
a.k.a. Flora Zhou